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poration v. Industrial Com. of Ohio, 236 U. S. 230; *Block v. City of Chicago*, 239 Ill. 251, 87 N. E. 1011, 130 Am. St. Rep. 219. See 13 MICH. L. REV. 515; 14 MICH. L. REV. 138. It is not a delegation of legislative authority for the state legislature to clothe an administrative board or officer with power to issue permits to exhibit moving pictures when the picture is not immoral or obscene, though the circumstances of the case necessitate the use of discretion. *Mutual Film Corporation v. Industrial Com. of Ohio*, *supra*; *Mutual Film Corporation v. Hodges*, 236 U. S. 248. Nor does the censorship by a state board of moving pictures intended for exhibition within the state interfere with interstate commerce. *Mutual Film Corporation v. Industrial Com. of Ohio*, *supra*. Nor is it discriminatory or unreasonable. *Block v. City of Chicago*, *supra*. A state statute providing for the censorship of moving pictures does not violate a clause in the state constitution guaranteeing the freedom of the press. *Mutual Film Corporation v. Industrial Com. of Ohio*, *supra*; *Mutual Film Corporation v. Hodges*, *supra*. See 2 VA. L. REV. 216. It has been held that an ordinance giving a chief of police power to issue permits to exhibit moving pictures, and further providing that no permit should be issued to show any immoral or obscene picture, is not a delegation of a discretionary or judicial power by the legislature; and also that such an ordinance did not deny one due process of law, since no one has the right to exhibit immoral pictures. *Block v. City of Chicago*, *supra*.

CONSTITUTIONAL LAW—POLICE POWER—MUNICIPAL CORPORATIONS—SEGREGATION OF RACES.—A city council passed an ordinance making it unlawful for members of one race to occupy, as a place of abode, a house in a block where the majority of the residences were occupied by members of the other race. The ordinance contained no provision protecting rights already vested. The defendant, a negro, moved into a block where a majority of the residences were occupied by white people. Defendant was prosecuted for violating the ordinance and defended on the ground that it was invalid. *Held*, the ordinance is valid, as to rights vesting after its enactment. *Hopkins v. City of Richmond* (Va.), 86 S. E. 139. See NOTES, p. 304.

FEDERAL EMPLOYERS' LIABILITY ACT—ACTION IN STATE COURT—JURY.—An action was brought under the Federal Employers' Act in the court of a state, which by statute, provided for a civil jury of seven. *Held*, The Seventh Amendment of the Constitution of the United States does not apply to actions under the Act in state courts; and that the action might be tried by a jury of seven. *Chesapeake & O. R. R. Co. v. Carnahan* (Va.), 86 S. E. 863. See NOTES, p. 312.

INSURANCE—MUTUAL BENEFIT INSURANCE—RIGHTS OF BENEFICIARY.—The insured took out a life insurance policy in a benefit insurance society, payable at his death to certain beneficiaries. Subsequently, the insured became feeble in health and weak in mind, and therefore easily influenced; and the defendant, one of the beneficiaries, induced him to make the policy payable to her alone. On his death the defendant collected the amount due under the policy; and the plaintiff, another beneficiary,